

# Akin Gump

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December 5, 2022

VIA ECF

The Honorable Judge John G. Koeltl  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Hayes, et al.*, No. 20 Cr. 500 (JGK)

Dear Judge Koeltl:

We represent Arthur Hayes and respectfully submit this letter on behalf of Mr. Hayes, Benjamin Delo, and Samuel Reed, whose counsel are copied on this letter.

We write pursuant to 18 U.S.C. § 3563(c) to request modification of the conditions of probation entered in the above-referenced matter with respect to Messrs. Hayes, Delo, and Reed, respectively (*see* ECF Nos. 344, 360, 383). The Court noted during Mr. Dwyer's sentencing hearing (Dwyer Sentencing Hr'g Tr. at 14:11-12) that it had changed Standard Condition of Supervision Number 8 for co-defendant Mr. Dwyer to allow Mr. Dwyer to maintain contact with Messrs. Hayes, Delo, and Reed "for business purposes" without obtaining permission from his probation officer. (*See* ECF No. 422 at 2.) We respectfully request that the same change be made to Messrs. Hayes, Delo, and Reed's Standard Condition of Supervision Number 8, so that they, correspondingly, may have contact with Mr. Dwyer for business purposes.

The government has no objection to Messrs. Hayes, Delo, and Reed's request.

Sincerely,



Katherine R. Goldstein

cc: Patrick J. Smith (*counsel for Benjamin Delo*)  
Harlan A. Levy (*counsel for Benjamin Delo*)



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Douglas K. Yatter (*counsel for Samuel Reed*)

Benjamin Naftalis (*counsel for Samuel Reed*)

AUSAs Jessica Greenwood, Samuel Raymond, and Nathan Rehn

All Counsel of Record (*via ECF*)